PRBO Conservation Science 3820 Cyptess Drive #11 Peruluma, CA 94954

ref 707 781 2555 fax 707.765 1685 email pribo@pibo org www prbo org



July 2, 2009

Rosanne Foust Redwood City Mayor 204 Upland Court Redwood City, CA 94062

Dear Mayor Foust:

On behalf of PRBO Conservation Science, I am writing today to express our strong opposition to the proposed salt pond development project in Redwood City put forward by Cargill and DMB Associates.

PRBO Conservation Science (PRBO) is a conservation science non-profit founded in 1965. We work throughout California, western United States, and the Antarctic to conserve birds, other wildlife, and their habitats through research and outreach. Our valued partnerships with resource management agencies, non-governmental organizations, academic institutions and private landowners help us meet the ever-increasing demand for sound science to assess and guide conservation investments and policy.

PRBO is a leader in shorebird conservation nationally and internationally, and has been monitoring shorebirds in the Pacific Flyway for over 30 years. Our data were instrumental in designating the San Francisco Bay as a site of "Hemispheric Importance" (used by over 500,000 shorebirds) by the Western Hemisphere Shorebird Reserve Network in 1989.

Our science indicates the following consequences for wildlife and wetland ecosystems in the San Francisco Bay region if the proposed development occurs:

1. A loss of critical wintering and migratory stop-over habitat for at least 24.800 migratory shorebirds. PRBO biologists surveyed the Redwood Plant site during winter high tides in the 1990's. We documented between 9,600 and 24,800 migratory shorebirds using the ponds for resting, feeding, and wintering habitat. These were among the highest counts from the west side of the Bay between the Bay and Dumbarton bridges, making up 20-51% of the total from that region. We counted birds from outside the perimeter of the plant meaning these numbers are considered to be an underestimate of total shorebird abundance using the site. Conversion of this site from managed ponds to residential development would result in a loss of migratory stop-over and wintering habitat for these birds. Given that more than 90% of California's wetlands have been lost, preserving critical wetland habitat is essential to preserving healthy populations of migratory shorebirds along the Pacific Flyway.

- Habitat for the federally-threatened snowy ployer will be impacted. PRBO biologists have documented the occurrence of the federally threatened Western Snowy Ployer at the Redwood Plant site in the past. The listed Pacific coast population is now just 1500-2000 birds; to ensure the survival of this threatened species, nesting sites need to be protected.
- 3. The Baylands Ecosystem Habitat Goals Report (1999), written by over 100 scientists and a wide range of public and private agencies, calls for the restoration of over 20,000 acres of tidal marsh and management of 10,000-15,000 acres of salt pond habitat for wildlife in the South Bay sub region of SF Bay. To meet the acreage goals and to maintain the health and integrity of the San Francisco Bay ecosystem, habitat such as those proposed for development by Cargill and DMB need to be restored and protected.
- 4. Developing undeveloped land will limit the ability to restore and protect tidal marsh, mudflats, and managed ponds as sea levels rise. Existing and future intertidal habitats need to be restored, managed for wildlife, and protected from development to ensure that species and habitats have a place to which they can move as sea level rises. This is especially true for salt ponds with existing channel formations that greatly improve a site's ability to restore natural tidal function and provide some protection to nearby upland buildings as well as other infrastructure from rising sea levels.

Increased development at the Redwood City Saltworks poses serious threats to migratory birds and the ecosystem functions we all depend upon. For further information, please do not hesitate to contact Gary Page, Wetlands Ecology Director, at 415-868-0371, ext. 309, or by email at <a href="mailto:gpage@prbo.org">gpage@prbo.org</a>. Thank you for considering our concerns.

Sincerely.

Ellie Cohen

President and CEO

Cc. R. Sean Randolph, Chair BCDC
Anne Halsted, Vice Chair, BCDC
Brian Baird, Commissioner
Tom Bates, Commissioner
Jim Bourgart, Commissioner
Valerie Brown, Commissioner
David Chiu, Commissioner

Karen Finn, Commissioner Geoffrey Gibbs, Commissioner John Gioia, Commissioner Larry Goldzband, Commissioner Richard Gordon, Commissioner Jane Hicks, Commissioner Colleen Jordan Hallinan,

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